

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No: 21-cr-10001-NMG
)	
NEAL GRUBERT,)	
Defendant.)	

JOINT INTERIM STATUS REPORT

Pursuant to Local Rule 116.5(b), the parties hereby file the following status report prepared in connection with the status conference scheduled for March 26, 2021. In light of the information set forth below, the parties request that the hearing be cancelled.

(1) Automatic Discovery/Pending Discovery Requests

The Government has provided automatic discovery. There are no pending discovery requests.

(2) Additional Discovery

The parties are still in the process of arranging the in-person review of contraband materials by the defense team.

(3) Timing of Additional Discovery Requests

Defense counsel has not yet determined whether she will make additional discovery requests. The parties expect to be able to resolve discovery requests related to the forensic examination of digital evidence without the need for litigation.

(4) Protective Orders

The Court has issued a protective order regarding the production of sensitive discovery materials. The parties do not anticipate the need to seek additional protective orders.

(5) Pretrial Motions

The defendant has not yet determined whether he will file any pretrial motions under Fed. R. Crim. P. 12(b), and reserves the right to do so in accordance with a pretrial scheduling order.

(6) Expert Discovery

The Government agrees to provide any expert witness disclosures 21 days prior to trial. The Defendant agrees to provide any expert witness disclosures 14 days prior to trial.

(7) Defenses of Insanity, Public Authority, or Alibi

The defendant does not intend to raise a defense of insanity, public authority, or alibi.

(8) Speedy Trial Act

All of the time has been excluded from the defendant's initial appearance/arraignment through the date of the interim status conference scheduled for March 26, 2021. The parties request that the time be excluded until the final status conference, pursuant to 18 U.S.C. § 3161(h)(7)(A).

(9) Status of Plea Negotiations & Likelihood of Trial

The parties expect to engage in negotiations regarding the resolution of the case following defense review of forensic materials. If the case were to proceed to trial, the parties estimate that it can be tried in one week.

(10) Scheduling of Further or Final Status Conference

The parties request that the case be scheduled for a final status conference in approximately 45 days.

Respectfully submitted,

NEAL GRUBERT
By his Attorney,

NATHANIEL R. MENDELL
Acting United States Attorney

/s/ Sandra Gant
Assistant Federal Public Defender

By: /s/ Anne Paruti
Assistant U.S. Attorney

Dated: March 24, 2021

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing upon all counsel of record by electronic filing notice.

/s/ Sandra Gant

Attorney for Neal Grubert

Dated: March 24, 2021